

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

UBS AG, UBS EUROPE SE (f/k/a UBS
(LUXEMBOURG) SA), UBS FUND SERVICES
(LUXEMBOURG) SA, UBS THIRD PARTY
MANAGEMENT COMPANY SA, ACCESS
INTERNATIONAL ADVISORS LLC, ACCESS
INTERNATIONAL ADVISORS LTD., ACCESS
MANAGEMENT LUXEMBOURG SA (f/k/a
ACCESS INTERNATIONAL ADVISORS
(LUXEMBOURG) SA) as represented by its
Liquidator MAÎTRE FERNAND ENTRINGER,
ACCESS PARTNERS SA as represented by its
Liquidator MAÎTRE FERNAND ENTRINGER,
PATRICK LITTAYE, CLAUDINE MAGON DE
LA VILLEHUCHET (a/k/a CLAUDINE DE LA
VILLEHUCHET) in her capacity as Executrix
under the Will of THIERRY MAGON DE LA
VILLEHUCHET (a/k/a RENE THIERRY DE LA
VILLEHUCHET), CLAUDINE MAGON DE LA
VILLEHUCHET (a/k/a CLAUDINE DE LA

Adv. Pro. No. 10-04285 (CGM)

VILLEHUCHET) individually as the sole beneficiary under the Will of THIERRY MAGON DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), PIERRE DELANDMETER, THEODORE DUMBAULD, LUXALPHA SICAV as represented by its Liquidators MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA AND PAUL LAPLUME, in their capacities as liquidators and representatives of LUXALPHA SICAV, and GROUPEMENT FINANCIER LTD.,

Defendants.

STIPULATION AND ORDER

Irving H. Picard, as trustee (the “**Trustee**”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*III*, and the estate of Bernard L. Madoff, and defendant Pierre Delandmeter (together with the Trustee, the “**Parties**”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on January 20, 2022, this Court entered a scheduling Stipulation and Order (ECF No. 272);

WHEREAS, on February 28, 2022, the Trustee filed a Second Amended Complaint (ECF No. 274);

WHEREAS, on April 22, 2022, defendants UBS AG, UBS Europe SE (f/k/a UBS (Luxembourg) SA), UBS Fund Services (Luxembourg) SA, UBS Third Party Management Company SA, Access International Advisors LLC, Access International Advisors Ltd., Access Management Luxembourg SA (f/k/a Access International Advisors (Luxembourg) SA), Access Partners SA, Patrick Littaye, Claudine Magon de la Villehuchet (a/k/a Claudine de la Villehuchet), Pierre Delandmeter, Theodore Dumbauld, and Groupement Financier Ltd. (the

“Moving Defendants”), filed four separate Motions to Dismiss the Second Amended Complaint on April 22, 2022 (ECF Nos. 281, 290, 295, 302);

WHEREAS, on June 17, 2022 the Trustee filed a consolidated Opposition to the Motions to Dismiss (ECF No. 307);

WHEREAS, pursuant to the January 20, 2022 Stipulation, the Moving Defendants are to file any reply briefs on or before July 29, 2022;

WHEREAS, by Notices of Hearing filed on April 22, 2022 (ECF Nos. 279, 288, 293, 298), the Moving Defendants noticed the hearings on the Motions to Dismiss for September 14, 2022.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. The date by which defendant Pierre Delandmeter’s reply brief must be filed is adjourned to September 30, 2022.
2. The hearing on Mr. Delandmeter’s Motion to Dismiss is adjourned from September 14, 2022 to October 19, 2022.
3. This Stipulation may be signed by respective counsel for the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: July 22, 2022
New York, New York

/s/ Oren J. Warshavsky

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Liquidation of Bernard L. Madoff
Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

/s/ Scott M. Berman

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*Attorneys for Defendant Pierre
Delandmeter*

SO ORDERED.

**Dated: July 25, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**